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EG&G ROCKY FLATS

ST. LTR LNC

TTI, R.L.

IN, A.

H.S.

D.B.

L.G.J.

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A.D.W.

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P.

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L.D.M.M.

A.F.G.

S.E.J.K.

R.V.

G.L.

V.M.

H.

N.B.

B.R.

T.D.L.

V.M.T.

N.E.B.

ON, R.B.

S.S. (ORC)

J.M.

D.

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EN, T

E.R.

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PLACE

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EG&G ROCKY FLATS, INC.

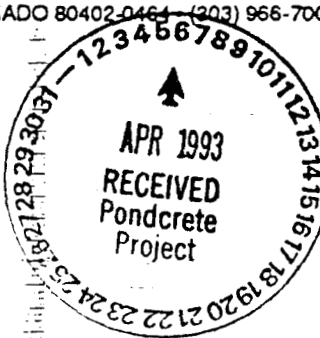
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March 23, 1993

Frazer R. Lockhart
Environmental Restoration Division
DOE, RFO**MEETING NOTES FROM THE MARCH 17, 1993 REGULATOR MEETING - EML-187-93**

Following is the meeting notes from the March 17, 1993 meeting with representatives from the Department of Energy, the Colorado Department of Health, the Environmental Protection Agency and EG&G Rocky Flats, Inc. These notes are from discussions at the meeting, but do not reproduce the handouts and presentations given.

- Ray Boyle presented the status of the modular tanks. DOE is not certain all three tanks will be available for use on April 16, though repairs on the liner leaks in the third tank are proceeding. CDH indicated DOE could divert the trench water as planned while completing repairs on the third tank.
- EG&G Waste operations is planning some tests to determine if two of the B-Pond cells can simultaneously be consolidated while still allowing necessary settling of the consolidated sludge. EG&G may have some results to discuss next month.
- EG&G requested that a briefing to the Quality Action Team on Solar ponds remediation life-cycle costs be scheduled for after the trench diversion on April 16.
- EG&G mentioned that DOE is considering making a request to CDH and EPA to move the 750 and 904 storage pad out of Operable Unit (OU) 10 and in to OU 4. The pros and cons are still being developed.
- The decision to demobilize HNUS cementation equipment was discussed. The demobilization is not expected to foreclose the option to cement sludge; it is intended to save money on rental costs. It may be possible for DOE to achieve the same cost savings by purchasing the equipment, and that is being evaluated.
- Mixing C Pond and B Pond sludge was discussed. The two sludges were kept separate because a mixed sludge was expected to be more voluminous when cemented than the two separate sludges. DOE is also concerned that the F039 designation, which they expect to add to the B Pond wastes but not the C Pond wastes, will require additional characterization and treatability work. CDH did not feel the F039 designation would have a practical effect. EG&G indicated the mixture could be re-evaluated at the same time the decision is made on the interim storage final disposal location for the treated sludge. There was some



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discussion on the saltcrete reprocessing being considered part of Federal Facilities Compliance Agreement (FFCA II) agreement. EG&G feels none of those treatments are available yet, but holding the sludge until a disposal site is finalized does allow the option of using a new technology in the future. EG&G feels that holding the sludge until a disposal site is available allows the option of using future alternative technologies, if available and prudent.

- Corrective Action Management Units (CAMUs) were discussed. Rocky Flats staff are excited about applying the CAMU regulatory frame work to the ponds. CDH indicated the state was unlikely to produce Colorado versions of CAMUs soon, due to lack of available staff. While the CDH representatives present do not expect to have primary responsibility for promulgating CAMU regulations, they think CDH is more interested in CAMUs for interim, rather than final, actions.
- Alternatives for handling the pond liners were discussed. EG&G feels the remediation investigation data may indicate the liners and soil immediately below the liners is clean enough to allow the liners to stay in place. CDH doubts this will be so. Everyone is anxious to see the data when it comes in. EPA noted that any interim measure DOE proposes must be consistent with possible final remedies, and adding new liners over existing liners that may need to be removed could be a bad idea. CDH noted that every closure of a surface impoundment in Colorado has included removal of the wastes.
- The best use of the IAG Table 6 IM/IRA was discussed. Though originally planned to provide RCRA closure for the ponds, it may be better to decrease the scope of the IM/IRA and accelerate the schedule. EG&G may be able to start on the IM/IRA in June, 1993. The RI data is needed to proceed to a decision on the best use of the IM/IA.
- CDH reviewed the steps and requirements for a hazardous waste landfill to be created. It may be very difficult to find a suitable site at Rocky Flats. The Colorado Geological Survey is a source for suitable siting information. The Solar Ponds' proximity to Walnut Creek may be sufficient to render the site unsuitable. The county government also must be involved. CDH is concerned that DOE could expend a lot of resources on the landfill option when it has a very poor chance of success. Remediation Investigation results directly below the ponds may be needed for a landfill closure option, and angle or horizontal drilling may be required for that, even if it is not required for the RFI/RI report. CDH recommended that DOE and EG&G work with the Colorado regulations and not just the 40 CFR regulations to ensure they understand the requirements.

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CDH heard that someone had told upper DOE, RFO management that a landfill option would be easy. They want this mistake corrected. The landfill option looks very difficult. DOE agreed to correct the possible false impression in their management.

- DOE would like to receive written endorsement from CDH on the approach to closure of the Solar Ponds. DOE will draft a letter for CDH's response. CDH made it clear they can not commit to any decision that requires data that has not yet been presented.
- The contents of DOE's request for an extension on the RFI/RI draft and final reports were discussed. CDH and EPA emphasized that all the reasons for the delay, not just the delay in pond sludge removal, must be included. They agreed to delay a planned meeting on the OU 4 activities for one week to allow EG&G and DOE to complete the extension request. EPA and CDH expect to have a meeting between the regulators to discuss options for the Table 6 IM/IRA.

The next meeting was tentatively set for Tuesday, April 20, 9:00 am. DOE expects to include pad storage issues and the Building 910 sampling plans in that meeting. DOE must confirm the topics with CDH and EPA since they may need to bring additional representatives to discuss these issues. DOE expects to invite a representative of the CDH air permit group to the discussion of the Building 910 sampling plan.

If you have any questions, or need additional information please contact J. B. Mellen on 966-8607.



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KCL:apt

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